

## REMARKS/ARGUMENTS

### 1.) Claim Amendments

The Applicant has canceled claims 32-97. Claims 98-105 have been added. Applicant respectfully submits no new matter has been added. Accordingly, claims 98-105 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

### 2.) Claim Rejections – 35 U.S.C. § 102(e)

Claims 32-97 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Brustoloni, et al.* (US 6,886,103). The Examiner stated that the original claims used such broad and vague terms that Brustoloni anticipates every claimed limitation. In order to expedite allowance of this application, the Applicant has canceled claims 32-97 without prejudice. Therefore, this rejection with respect to these claims is deemed to be moot. The Applicant has added claims 98-105 to more clearly define the intended scope of the claimed invention. The Examiner's consideration of the amended claims is respectfully requested.

New claim 98 recites a method for supporting establishment of a connection between a node of an inside address realm and a node of an outside address realm through an intermediate communication gateway having a limited number of available outside-realm gateway addresses for enabling outside-realm representation of inside-realm nodes. The method begins by identifying an outside-realm gateway address based on network address information of at least one of the inside-realm node and the outside-realm node. The method identifies an outside-realm gateway address that, in combination with the network address information, defines an outside-realm gateway state representation that has no counterpart in a predetermined set of existing gateway connection states. The method then initiates establishment of the connection based on the identified outside-realm gateway state representation.

The Applicant can find no teaching or suggestion in Brustoloni of a connection establishment method that identifies an outside-realm gateway address that provides a previously unused combination when combined with network address information of the

inside-realm node or the outside-realm node (i.e., defines an outside-realm gateway state representation that has no counterpart in a predetermined set of existing gateway connection states). Therefore, the allowance of claim 98 and dependent claim 99 is respectfully requested.

Claim 105 is a system claim corresponding to method claim 98. Therefore the allowance of claim 105 is respectfully requested for the same reasons discussed for claim 98.

New claim 100 recites a method of increasing a number of outside-realm initiated connections between nodes of an inside address realm and nodes of an outside address realm. The connections are made through an intermediate communication gateway having a gateway address pool comprising a limited number of outside-realm gateway addresses for enabling outside-realm representation of inside-realm nodes. The method includes the steps of receiving in a connection request, a network address of an initiating outside-realm node; selecting from the gateway address pool, an outside-realm gateway address to combine with the received network address; and determining whether the combination of the selected outside-realm gateway address and the received network address is already being utilized to set up a connection. If the combination of the outside-realm gateway address and the received network address is already being utilized to set up a connection, the selecting step is repeated until a unique combination is found that is not already being utilized to set up a connection. The method also includes establishing a partial gateway connection state utilizing the unique combination of the outside-realm gateway address and the received network address; transforming the partial gateway connection state to a complete gateway connection state upon receipt of a first data packet over the connection; and repeating the method for each connection request. In this way, multiple connections can be set up for each outside-realm node utilizing different combinations of the network address of the outside-realm node and different outside-realm gateway addresses from the gateway address pool.

The Applicant can find no teaching or suggestion in Brustoloni of a connection establishment method that selects an outside-realm gateway address from a gateway

address pool that, when combined with the network address information of the outside-realm node, provides a combination that is not already being utilized to set up a connection. Therefore, the allowance of claim 100 and dependent claim 101 is respectfully requested.

New claim 102 is similar to claim 100 except that port information is received in the connection request instead of network address information. An unused combination of port information and outside-realm gateway address is then found and used for the connection. The Applicant can find no teaching or suggestion in Brustoloni of such a connection establishment method. Therefore, the allowance of claim 102 is respectfully requested.

New claim 103 recites a method of increasing a number of outside-realm initiated connections between nodes of an inside address realm and nodes of an outside address realm. The connections are made through an intermediate communication gateway having a gateway address pool comprising a limited number of outside-realm gateway addresses for enabling outside-realm representation of inside-realm nodes. The method includes receiving in a connection request from an initiating inside-realm node, a network address of a destination outside-realm node. Based on the received network address of the destination outside-realm node, an outside-realm gateway address is selected from the gateway address pool to combine with the received network address. The method then determines whether the combination of the selected outside-realm gateway address and the received network address is already being utilized to set up a connection. If the combination of the outside-realm gateway address and the received network address is already being utilized to set up a connection, the selecting step is repeated until a unique combination is found that is not already being utilized to set up a connection. The unique combination is then utilized to establish the connection.

The Applicant can find no teaching or suggestion in Brustoloni of a connection establishment method that selects an outside-realm gateway address from a gateway address pool that, when combined with the network address of a destination outside-realm node, provides a combination that is not already being utilized to set up a

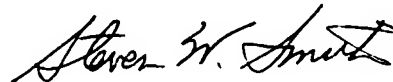
connection. Therefore, the allowance of claim 103 and dependent claim 104 is respectfully requested.

### 3.) Conclusion

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 98-105.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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